

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-against-

NOTICE OF MOTION

WIDOLPH BRUMAIRE, et al.

DOCKET NO:
18-CR-00153 (CM)

Defendant.

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PLEASE TAKE NOTICE that the Defendant, Widolph Brumaire, by his attorney Maryam Jahedi, upon the accompanying Memorandum of Law, dated September 14, 2018, and the annexed Declaration of Maryam Jahedi, dated September 14, 2018, with exhibits A through C, will move the Court, before the Honorable Colleen McMahon, United States District Judge, for the Southern District of New York, 500 Pearl Street, New York, New York, for the following relief:

- I. Pursuant to Fed. R. Crim. P. 7 (f) and Fifth Amendment to the United States Constitution, directing the Government to file a Bill of Particulars;
- II. Motion for exclusion of co-defendants out-of-court statements under *Bruton/Richardson/Crawford*;
- III. Ordering disclosure of the confidential informants;
- IV. Ordering disclosure of witness list and statements;
- V. Pursuant to the Fifth and Sixth Amendments to the United States Constitution and Rule 2 of the Federal Rules of Criminal Procedure, directing the early disclosure of *Jenks* Act Material and timely disclosure of *Brady/Giglio* Material;
- VI. Permitting Mr. Brumaire to join in the motions of his co-defendants;
- VII. Granting leave to make further motions; and

VIII. Granting such other and further relief as this Court deems just and proper.

Dated: New York, New York
September 14, 2018

Yours, etc.

_____/S/_____
MARYAM JAHEDI, ESQ.
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